

# EXHIBIT

# A

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March 26, 2013

John H. Bredell, Esq.  
119 North Huron Street  
Ypsilanti, MI 48197

Re: Nationwide v Keene  
O/File: 839576

Dear Mr. Bredell:

We reviewed the documents that you produced in your supplemental response to Nationwide's Motion to Compel Discovery.

The following documents have still *not* been produced and there is no letter from the financial institution indicating that they do not exist:

**17(f) Please provide copies of all debt documents (personal loans, land contracts, promissory notes, mortgages, bank loans, business loans, credit cards, credit accounts, lines of credit, etc.), from 1998 through 2010 including, but not limited to the following accounts:**

**a. ~~National City Home equity line of credit account ending #7813:~~**

**i. ~~All statements except for statement ending March 10, 2010~~**

You initially advised that these statements were requested and would be produced.

In your supplemental response, however, you claim that this was a Home Equity Loan that was sold/given to SRA Associates and that the property went into foreclosure. You also attach copies of the sales/listing information and a letter from

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PNC bank discussing the settlement of the account. You then claim that National City and PNC have no statements.

This response is inconsistent with the fact that a previous statement dated March 10, 2010 has already been provided regarding this account. Further, the PNC letter attached appears to have been heavily redacted and part of the page and wording is cut off on our copy. Finally, there is no letter from National City/PNC affirmatively stating that no statements are available for this account.

Please provide the information requested.

**b. Washington Mutual Account ending #1514:**

**i. Statements for all months except for October 17, 2006**

In your initial response you advised that this account was transferred to Chase and then attached a transaction history from 1/1/08 to 12/9/13. We requested further information because there was no indication whether or not Washington Mutual (not Chase) has or has not retained records prior to 1/1/08 or if a request for these records was even made to Washington Mutual.

In your supplemental response, you indicate that this was a mortgage for a rental property that went into foreclosure and that Chase cannot print out statements and that you have previously provided all of the information the bank had available.

There is still no mention in your supplemental response of whether Washington Mutual was contacted or if it retained any of these letters. Further, the Judge ordered that if financial information from a bank was unavailable then a letter must be provided from the bank to that effect. No such letters have been attached to your response regarding Chase and Washington Mutual.

**c. Chase MasterCard account ending #0389:**

**i. All statements from 1998 to statement ending November 10, 2008**

In your initial response you claimed to attach statements from 12/11/06 to 12/10/08, but these were not attached.

Your supplemental response includes only the first page for statements from 12/11/06 to 4/10/08 and 8/11/08 to 12/10/08. Please provide all pages for these

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statements. Further, you completely fail to attach any statements for activity between 4/11/08 to 8/10/08. Please provide all pages to these statements as well and/or a letter from the bank indicating that these statements are not available.

**f. National City Card account ending #9960:**

You initially advised that these statements were requested and that they would be produced.

In your supplemental response you advise that this account became a PNC account and that National City/PNC and its attorneys, Weltman, Weinberg & Reif, do not have any statements. However, you do not attach any letter from National City/PNC or its attorneys to this effect. Please provide the statements or attach a letter from the financial institution indicating that no statements are available as required per the Court.

Very truly yours,  
HARVEY KRUSE, P. C.



Michael F. Schmidt

MFS:KAK

cc: Jeffrey A. Danzig, Esq.  
Albert L. Holtz, Esq.